## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the 2022 RES Compliance	)	
Report and 2023 RES Compliance Plan of	)	File No. EO-2023-0358
The Empire District Electric Company	)	
d/b/a Liberty	)	

## **MOTION FOR EXTENSION**

**COMES NOW** the Staff ("Staff") of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension*, states as follows:

- On April 14, 2023, The Empire District Electric Company d/b/a Liberty ("Liberty") its 2022 Renewable Energy Standard (RES) Compliance Report ("Report") and 2023 RES Compliance Plan ("Plan") as required by 20 CSR 4240-20.100(8).
- Thereafter the Commission ordered Staff to review the Report and Plan and to file a report on May 30, 2023.
- 3. While reviewing Liberty's Report and Plan, Staff discovered there were discrepancies in the information provided. Staff reached out to Liberty, and Liberty filed revised Report and Plan on May 24, 2023 to correct and clarify the information.
- 4. To adequately review the revised Report and Plan, as well as conduct any additional necessary discovery, Staff respectfully requests an extension to submit its recommendation. Staff respectfully request an extension to June 23, 2023, to file its recommendation. If Staff can complete its review and file its recommendation earlier, it will do so.
- 5. Counsel for Liberty has indicated it does not oppose an extension.

WHEREFORE, Staff respectfully requests an extension of time, to June 23, 2023, to file its recommendation.

Respectfully submitted,

## /s/ Nicole Mers

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## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 26<sup>th</sup> day of May 2023.

/s/ Nicole Mers